December 17, 2002

Winston Hickox, Secretary California Environmental Protection Agency 1001 I St. Sacramento, CA 95814

RE: Electronic Waste Forum

Dear Mr. Hickox:

Thank you for convening the forum on November 25 concerning California's E-waste problem. This forum provided acknowledgement to public agencies that the dilemma they are facing, concerning the processing of Cathode Ray Tubes (CRTs), is being addressed. We believe that it is necessary for California policy makers to demand that the producers of consumer electronics take responsibility for reducing the environmental impacts posed by their products.

In the City of Lompoc, the cost of processing Cathode Ray Tubes (CRTs) is \$.50/lbs. The City sends approximately 4 tons (8,000 lbs.) of electronic waste to its recycle processor every three weeks. Since the promulgation of the DTSC Electronic Waste Emergency Regulations in August, 2001, the City has spent approximately \$63,000 to provide for the proper disposal of CRTs. What is important to note is it that the cost of processing CRTs is incurred without a formal electronic waste recycling program in place, The CRTs sent to the recycle processor are those removed from the City of Lompoc Sanitary Landfill's load checking program. At this point, it is impossible to calculate the cost once the City establishes a formal electronic waste program. Although computers, including CRTs, are recyclable, the cost of collection, transportation, handling, dismantling and processing for recycling must be addressed. Right now the taxpayers are bearing the brunt of costs associated with the collection and processing of CRTs.

It is the City of Lompoc's belief that fee-based producer responsibility makes manufacturers responsible for the environmental impacts through the payment of a fee that reflect the net cost of recycling and/or the cost of other environmental impacts. The City of Lompoc participates in many such programs provided by the State of California in order to recycle or properly dispose of waste tire, used oil and beverage containers. In a fee based system, manufacturers incorporate a flat fee that simply generates revenue to address the problem collection and transportation costs. Public agencies then apply to the State for funding for proper disposal or recycling of recyclable materials. We believe that a similar system represents the best, most cost effective method for addressing California's e-waste problem.

Again, thank you for providing a forum for discussion on this very important topic. If I can provide you with more information concerning the City of Lompoc's electronic waste recycle processing, or any of the City's recycling programs, please do not hesitate to contact me at (805) 875-8023.

Sincerely,

Claudia A. Stine Solid Waste Superintendent